REMARKS

Upon entry of this amendment, claims 24 - 26, 28 - 30, 35 and 36 will be pending.

The Applicants appreciate the Examiner's continued attention and consideration.

Claims 24 – 26 and 28 – 30 are rejected under 35 U.S.C. 112, first paragraph, as failing to comply with the written description requirement. Independent claim 30 has been amended to, inter alia, delete any terms not clearly supported in the original application, as well as the "thickened section defining an inlet port" and "at least one recess formed in said wall" terms added in the 29 august 2005 amendment.

Accordingly, in view of the amendments, it is requested that the rejection be withdrawn.

Claims 24 - 26 and 28 - 30 are rejected under 35 U.S.C. 103(a) as being unpatentable over Kruger (EP 0 992 659 A2) in view of "3M Interam Mat Product guide", either Santiago et al. (U.S. 4,155,980) or Abthoff et al. (U.S. 4,145,394), and Smith et al. (U.S. 5,720,319).

Independent claim 30 has been amended to more clearly distinguish over the applied art as well as the 35 U.S.C. 112 issues discussed herein above. Claim 30 now recites:

A catalytic converter subassembly comprising:

- a cast exhaust manifold defining a collector body manifold wall;
- a catalytic converter shell having an end portion thereof cast in place within said manifold wall to effect a sealed interconnection therebetween;

- a catalyst substrate disposed in said catalytic converter shell;
- a mat support material disposed between said catalytic converter shell and said catalyst substrate; and

a mat protection ring disposed substantially concentrically within said shell and including opposed first and second ends, wherein said first end of said mat protection ring is cast in place within said manifold wall adjacent the end portion of the catalytic converter shell, and the second end of said mat protection ring penetrating at least a portion of said mat support material.

wherein said collector body manifold wall, catalytic converter shell and mat protection ring define cooperating retention features operative to affix the end portion of the catalytic converter shell and the first end of the mat protection ring within the cast collector body manifold wall."

Thus amended, independent claim 30 is clearly distinguishable from the applied art. None of the references disclose or suggest a catalytic converter shell and a mat protection ring which are cast in place directly within an exhaust manifold to produce scaling affixation therebetween, or the inclusion of cooperating retention features in the shell/ring and manifold to facilitate such retention/interlocking. Both Kruger and the 3M Product guide suggest the traditional (as mentioned in the background portion of the invention portion of the specification) approaches such as welding and use of expensive fabricated exhaust manifolds. Smith et al., Abthoff et al. and Santiago et al. are only viewed as peripherally relevant, and likewise do not disclose or suggest the inventive features of the present invention, alone or in combination with the other art of record. Smith et al. relates to the interconnection of an aluminum tailspout to the outlet of a stainless steel exhaust pipe for cosmetic/decorative purposes in a relatively low temperature environment. The Smith et al. device would not work in the extremely harsh environment of a juncture of an exhaust manifold and a catalytic converter.

Claims 24 - 26, 28 and 29 each depend, directly or indirectly, from independent claim 30, and are, thus, distinguishable over the applied art for the same reasons.

Accordingly, it is requested that the rejection be withdrawn.

Newly presented claims 35 and 36 are distinguishable over the art of record for the same reasons discussed hereinabove.

Conclusion

Applicants believe, in view of the amendments and remarks herein, that all grounds of rejection of the claims have been addressed and overcome, and that all claims are in condition for allowance.

If it would further prosecution of the application, the Examiner is urged to contact the undersigned at the telephone number provided.

The Commissioner is hereby authorized to charge any fees associated with this communication and/or credit any overpayments to Deposit Account No. 50-0831.

Respectfully submitted,

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